

The Honorable Ricardo S. Martinez

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON,

Plaintiff,

v.

ALDERWOOD SURGICAL CENTER, LLC,
a Washington limited liability company;
NORTHWEST NASAL SINUS CENTER,
P.S., a Washington professional service
corporation, and JAVAD A. SAJAN, M.D.,

Defendants.

NO. 2:22-cv-01835-RSM

STIPULATED MOTION FOR ENTRY
OF STIPULATED PROTECTIVE
ORDER

NOTE ON MOTION CALENDAR:
May 10, 2023

Pursuant to LCR 26(c)(2) and LCR 7(d)(1), the undersigned parties hereby move this Court to enter the attached proposed Stipulated Protective Order. The Parties believe this Stipulated Protective Order complies with the requirements for entry listed in LCR 26(c)(2).

The parties have attached both a clean version of the proposed Stipulated Protective Order and a redline version to show where it departs from the district's model protective order.

DATED this 10th day of May, 2023.

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Attorney General

/s/ Zorba Leslie

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*I certify that this memorandum contains 65
words, in compliance with the Local Civil
Rules*

CERTIFICATE OF SERVICE

I certify that I caused a copy of the foregoing to be served on all counsel of record via the ECF system.

I certify, under penalty of perjury under the laws of the State of Washington, that the foregoing is true and correct.

DATED this 10th day of May, 2023, at Seattle, Washington.

/s/ Zorba Leslie

ZORBA LESLIE, WSBA #58523
Assistant Attorney General